

**DIRECT TESTIMONY**

**of**

**Eric P. Schlaf**

**Energy Division  
Illinois Commerce Commission**

**Request for Approval of Revisions to Delivery Services Tariffs and for Approval of  
Delivery Services Implementation Plans for Residential Customers**

**Central Illinois Public Service Company, d/b/a AmerenCIPS  
And Union Electric Company, d/b/a AmerenUE**

**Docket No. 00-0802**

**April 20, 2001**

1 **Q. Please state your name and business address.**

2 **A.** My name is Eric P. Schlaf. My business address is 527 East Capitol Avenue,  
3 Springfield, Illinois, 62701.  
4

5 **Q. By whom are you employed and in what capacity?**

6 **A.** I am employed by the Illinois Commerce Commission ("Commission") as an  
7 Economist in the Energy Division. My primary responsibility is to provide  
8 recommendations to the Commission about issues connected with the  
9 implementation of the "Electric Service Customer Choice and Rate Relief Law of  
10 1997" (220 ILCS 5/16).  
11

12 **Q. Please state your educational background and professional experience.**

13 **A.** I obtained a B.A. in 1982 from the University of Illinois at Champaign-Urbana. I  
14 received an M.A. in Economics in August 1984 and a Ph.D. in Economics in June  
15 1991 from the University of Illinois at Chicago.  
16

17 I joined the Commission in March 1990, serving in the Least-Cost Energy Program.  
18 In March 1992, I moved within the Commission to the Office of Policy and Planning.  
19 The Office of Policy and Planning was subsequently merged into the Energy  
20 Division. I have also taught numerous courses in economics and statistics at the  
21 University of Illinois at Chicago, Roosevelt University, and the University of Illinois at  
22 Springfield (formerly Sangamon State University).

**Q. Have you testified about electric utility industry issues in other dockets before this Commission?**

**A.** Yes, many times.

**Q. What is the purpose of your direct testimony in this proceeding?**

**A.** I discuss Staff's review of the terms and conditions portion of the AmerenCIPS and AmerenUE delivery services tariff filings. I also discuss the relationship between the instant proceeding and two recently concluded proceedings in which terms and conditions of Ameren's delivery services tariffs were at issue, the "Uniformity" proceeding, Docket No. 00-0494 and the "Market Value" proceeding, Docket Nos. 00-2059, 00-0395 and 00-0461 (Consolidated).

**Q. Does Staff recommend changes to any of the terms and conditions of the delivery services tariffs filed by the Ameren companies?**

**A.** No.

**Q. Why does Staff have no recommendations for changes to the delivery services tariffs filed by the Ameren companies?**

**A.** With the exception of Rider SG, a new tariff proposal, Ameren is proposing only minor changes to the terms and conditions of its existing delivery services tariffs. Staff has no objection to any of these changes.

45 Additionally, Staff and other parties to the Uniformity and Market Value proceedings  
46 extensively reviewed the terms and conditions of the Ameren companies' existing  
47 delivery services tariffs, which include Rates DS-2, DS-3, DS-4 (AmerenUE only),  
48 Rider ISS, Rider PRPS and Rider MV. During those proceedings, parties were  
49 able to seek changes to Ameren's existing tariff provisions. This is particularly true  
50 of the Uniformity proceeding, as the list of litigated issues in that proceeding was  
51 initially developed by the parties to the proceeding (see Order, Docket No. 00-  
52 0494, p. 2).

53  
54 With respect to the Uniformity proceeding, the parties created a "Stipulation," which  
55 was subsequently approved by the Commission in an Interim Order on October 6,  
56 2000. The Stipulation required the Ameren companies and other electric utilities to  
57 make certain changes to their tariffs. Ameren incorporated these changes into their  
58 tariffs prior to the date on which they filed tariffs in this proceeding. In addition to the  
59 resolution of the issues described in the Stipulation, the parties litigated other  
60 issues, which were resolved by the Commission in an order issued on March 21,  
61 2001.

62  
63 With respect to the Market Value proceeding, Ameren filed tariff sheets on April 18,  
64 2001, to conform with the Commission's April 11, 2001 order.

65  
66 **Q. Did the final Order in Docket No. 00-0494 create any conflict with the present**  
67 **proceeding?**

68 **A.** Possibly. The order in Docket No. 00-0494 contains a directive to the parties to  
69 engage in workshops in which possible modifications to the electric utilities' tariffs,  
70 as well as their Delivery Services Implementation Plans, will be discussed (Order,  
71 Docket No. 00-0494, p. 10). It is possible that the result of the workshops may be to  
72 require utilities to amend their delivery services tariffs and/or Implementation Plans.

73  
74 As described in the order, the main subjects of the workshops are to be the  
75 following: (1) the development of common definitions that describe the terms used  
76 in delivery services tariffs; (2) the development of "uniform language applicable to  
77 delivery services tariffs"; and, (3) the development of uniform implementation plans  
78 (Ibid.)

79  
80 Additionally, the Commission makes clear in its order that the electric utilities should  
81 revise their "Customer" tariffs (the Ameren companies' Rates DS-2, DS-3, DS-4)  
82 and their "Supplier" tariffs (AmerenCIPS' and AmerenUE's Retail Electric Supplier  
83 ("RES") Terms and Conditions) to conform to a common "outline." However, the  
84 order did not set a definite date by which the revised tariffs should be filed. This is a  
85 subject for the workshops. The order in Docket No. 00-4049 stated:

86 [A]t the conclusion of the workshops, Staff should prepare and submit a final  
87 report to the Commission that...:

- 88  
89 (iv) .... if not agreed to by the parties in the workshops, should address  
90 the dates by which utilities would make compliance filings to (1)  
91 reorganize their DSTs in accordance with the common outlines  
92 adopted by the Commission....(Commission Order, Docket No. 00-  
93 0494, p. 10).

94

95 **Q. Does Staff have an opinion as to when the utilities should reorganize their**  
96 **tariffs to conform to a common outline?**

97 **A.** Staff believes that the utilities' tariffs should be modified to reflect the format  
98 identified in the Appendix to the order in Docket No. 00-0494 during 2001. As a  
99 point of reference, Staff expects that the other electric utilities may consider filing  
100 revised tariffs that conform to the standard outline with their June 2001 residential  
101 delivery services tariff filings. Thus, it may be the case that Ameren's delivery  
102 services tariffs may need to be modified prior to the conclusion of this proceeding.  
103 Whether Ameren would file any revised tariffs as part of this proceeding is an open  
104 question.

105

106 **Q. Does Staff anticipate that Ameren may need to revise the Implementation**  
107 **Plans that it filed in this proceeding?**

108 **A.** I am not sure. It is conceivable, although perhaps not likely, that the workshop  
109 discussions could result in changes to the Implementation Plans that Ameren filed in  
110 this proceeding.

111

112 **Q. Are there other matters resulting from the order in Docket No. 00-0494 that**  
113 **might affect this proceeding?**

114 **A.** Yes. First, Ameren was directed to make certain changes to its Rider TC, its  
115 transition charge tariff (Ibid., p. 11). Again, whether these changes would affect this

116 proceeding is an open question. Second, certain matters concerning single billing  
117 tariffs were extensively litigated in Docket No. 00-0494. Compliance filings  
118 resulting from the Commission's order must be filed within 90 days of the March  
119 21<sup>st</sup>, 2001 order (Ibid., p. 18). I am not certain whether Ameren will need to modify  
120 any of the tariffs or riders it filed in this proceeding to comply with the single billing  
121 portion of the Commission's order.

122  
123 **Q. Does this conclude your direct testimony?**

124 **A.** Yes.